REMARKS

Applicants have studied the Office Action dated July 1, 2004 and have made amendments to the claims. It is submitted that the application, as amended, is in condition for allowance. Claims 1-36 are pending. Claims 1, 2, 4-10, 13, 14, 16, 17, 19-25, 28, 29, and 31-34 have been amended. Reconsideration and allowance of the claims in view of the above amendments and the following remarks are respectfully requested.

Overview of the Present Invention

The present invention is directed to data processing systems, computer readable mediums and methods for performing database operations. The database operations are performed by executing a "query string" that comprises a database query command to be executed by a database search engine. The exemplary embodiments of the present invention use Structured Query Language (SQL) as the database query language. In one exemplary embodiment of the present invention, these query strings, which comprise a database query command to be executed by a database search engine, are assembled by reading database query command elements, including a query language command and command arguments, that are stored in query element tables. These query element tables are able to be, but do not need to be, relational database tables themselves. The query element tables comprise at least one of a query language command and a command argument. See, for example, specification at page 7, lines 6-13.

Claim Interpretation

While MPEP § 2111 that was cited by the Examiner does call for the broadest reasonable claim interpretation, that same section cautions against "impermissible importation of subject matter from the specification into the claim" and advises that the "PTO applies to verbiage of the proposed claims the broadest reasonable meaning of the words in their ordinary usage as they would be understood by one of ordinary skill in the art, taking into account whatever enlightenment by way of definition or otherwise that may be afforded by the written specification in the applicant's specification."

Applicants' arguments in this and prior responses are based on the words that are actually in the claims. Applicants are not importing subject matter into the claims, but are simply demanding that the words in the claims be given their proper meaning in the art and within the scope of the present invention. All of the words in a claim are important and must be considered and given weight in analyzing the scope of that claim. The Examiner cannot just ignore any recited claim limitation or element, and must find all recited elements of the claim to be present in the cited references in order to make a proper rejection.

Here, the majority of the pending claims have been rejected under 35 U.S.C. § 103, which requires that "the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains." 35 U.S.C. § 103(a) (emphasis added). This legal requirement is explained in MPEP § 2141.02.

DISTILLING THE INVENTION DOWN TO A "GIST" OR "THRUST"
OF AN INVENTION DISREGARDS "AS A WHOLE" REQUIREMENT
Distilling an invention down to the "gist" or "thrust" of an invention disregards the requirement of analyzing the subject matter "as a whole." *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984) (restricting consideration of the claims to a 10% per second rate of stretching of unsintered PTFE and disregarding other limitations resulted in treating claims as though they read differently than allowed); *Bausch & Lomb v. Barnes-Hind/Hydrocurve, Inc.*, 796 F.2d 443, 447-49, 230 USPQ 416, 419-20 (Fed. Cir. 1986), *cert. denied*, 484 U.S. 823 (1987) (District court focused on the "concept of forming ridgeless depressions having smooth rounded edges using a laser beam to vaporize the material," but "disregarded express limitations that the product be an ophthalmic lens formed of a transparent cross-linked polymer and that the laser marks be surrounded by a smooth surface of unsublimated polymer."). See also *Jones v. Hardy*, 727 F.2d 1524, 1530, 220 USPQ 1021, 1026 (Fed. Cir. 1984) ("treating the advantage as the invention disregards statutory requirement that the invention be viewed 'as a whole' "); *Panduit Corp. v. Dennison Mfg. Co.*, 810 F.2d 1561, 1 USPQ2d 1593 (Fed. Cir.), *cert. denied*, 481 U.S. 1052 (1987) (district court improperly distilled claims down to a one word solution to a problem).

Thus, in this case it is improper to reduce the recited claim language to only "retrieving data from a database". Doing so requires the actual claim language to be ignored so to impermissibly broaden the scope of the pending claims, and this is clearly contrary to the applicable legal standard for claim interpretation.

Further, MPEP § 2106 provides guidance on evaluating patentable subject matter for computer-related inventions.

> [W]hen evaluating the scope of a claim, <u>every</u> limitation in the claim must be considered. Office personnel may not dissect a claimed invention into discrete elements and then evaluate the elements <u>in isolation</u>. Instead, the claim as a whole must be considered. See, e.g., *Diamond v. Diehr*, 450 U.S. at 188-89, 209 USPQ at 9 ("In determining the eligibility of respondents' claimed process for patent protection under 101, their claims must be considered as a whole. It is inappropriate to dissect the claims into old and new elements and then to ignore the presence of the old elements in the analysis. This is particularly true in a process claim because a new combination of steps in a process may be patentable even though all the constituents of the combination were well known and in common use before the combination was made.").

MPEP §2106(II)(C) (emphasis in original). Similarly, MPEP §2143.03 explains the general legal requirement that <u>all</u> claim limitations must be taught or suggested for the Examiner to establish a *prima facie* case of obviousness.

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

All of these cases stand for the proposition that "all words in a claim must be considered" in construction of the claim. Thus, in interpreting the pending claims, all of the recited claim language, including the elements discussed below such as "database query language command" and "database query command argument," must be given its ordinary meaning in the art in light of the specification, and cannot be completely ignored in analyzing the claims and applying the teachings of the cited references.

Rejection under 35 U.S.C. § 102(e) as being Anticipated by Emens et al.

The Examiner rejected claims 35 and 36 under 35 U.S.C. § 102(e) as being anticipated by Emens et al. (U.S. Patent No. 6,671,681). The Examiner cites 35 U.S.C. § 102(e) and a proper rejection requires that a single reference teach (i.e., identically describe) each and every element of the rejected claims as being anticipated by Emens. This rejection is respectfully traversed.

Applicants are filing a Declaration under 37 C.F.R. § 1.131 (see Attachment) to establish that the invention claimed in the present application was reduced to writing in the United States prior to May 31, 2000. Thus, the invention claimed in the present application was invented prior to May 31, 2000. The Emens reference cited by the Examiner has a 35 U.S.C. § 102(e) date of May 31, 2000, which is after the invention claimed in the present application was invented. Therefore, Emens cannot properly be cited against the present application as a prior art reference in a rejection under 35 U.S.C. § 102(e). Therefore, it is respectfully submitted that the rejection of claims 35 and 36 under 35 U.S.C. § 102(e) should be withdrawn.

Rejection under 35 U.S.C. § 102(b) as Anticipated by Beavin et al.

The Examiner rejected claims 35 and 36 under 35 U.S.C. § 102(b) as being anticipated by Beavin et al. (U.S. Patent No. 5,940,819). This rejection is respectfully traversed.

A proper rejection under 35 U.S.C. § 102(b) requires that the anticipating reference teach (i.e., identically describe) each and every element of the rejected claim. This legal requirement is explained in MPEP § 2131.

TO ANTICIPATE A CLAIM, THE REFERENCE
MUST TEACH EVERY ELEMENT OF THE CLAIM
"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). >"When a claim covers several structures or compositions, either generically or as alternatives, the claim is deemed anticipated if any of the structures or compositions within the scope of the claim is known in the prior art." *Brown v. 3M*, 265 F.3d 1349, 1351, 60 USPQ2d 1375, 1376 (Fed. Cir. 2001) (claim to a system for setting a computer clock to an offset time to address the Year 2000 (Y2K) problem, applicable to records with year date data in "at least one of two-digit, three-digit, or four-digit" representations, was held anticipated by a system that offsets year dates in only two-digit formats). See also MPEP § 2131.02.< "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e., identity of terminology is not required. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Note that, in some

circumstances, it is permissible to use multiple references in a 35 U.S.C. § 102 rejection. See MPEP § 2131.01.

The Beavin reference discloses a relational database management system that includes a query processor that permits consideration of alternative user-specified access paths. The Beavin reference teaches accessing and retrieving user data that is stored in relational database tables based upon database query commands that are provided by a user. Once a user provides this query command, the processing of the Beavin disclosure operates to perform the database query specified by the user in that query command. See Beavin at column 5, lines 11-13.

Further, the Beavin reference describes the database files as "tables" in accordance with conventional relational database nomenclature. The "tables" of the Beavin reference contain the data that is stored and queried by a relational database management system. Beavin at column 2, lines 60-67. In contrast to the present invention, the Beavin reference does not teach tables that contain database query elements, which are the elements of commands that are supplied to the database management system to perform a desired search. The "tables" of Beavin differ from the "first set of database tables" of the claimed invention in that "at least one data base query language command and at least one data base query command argument" are read from the "first set of database tables" as are claimed in the amended claims of the present invention.

Beavin does not inherently disclose storing at least one of a data base query language command and a data base query command argument in one or more query element database tables. Data base query commands are generally provided through many means, such as part of command line entered commands, in computer executed scripts and in compiled programs. These common methods of providing data base query commands preclude the teaching of Beavin from inherently disclosing the claimed limitations of the present invention.

Independent claim 35 is drawn to a data structure that includes "a name of a query element table that includes arguments to be used in composing a data base command to process data, the data base command comprising a data base query command to be executed by a data base search engine. Beavin does not teach, suggest or make obvious a query element table that includes arguments to be used in composing a data base command to process data, the data base command comprising a data base query command to be executed by a data base search engine. Beavin simply does not teach

storing data base query language commands or data base query command arguments in query element data base tables.

Further, SQL table operations, which allow linking of multiple tables in a single statement (as cited by the Examiner) do not teach a "query element table that includes arguments to be used in composing a data base command to process data, the data base command comprising a data base query command to be executed by a data base search engine" as is recited in claim 35.

For at least these reasons, independent claim 35 distinguishes over the Beavin reference, and the rejection of this claims under 35 U.S.C. § 102(b) should be withdrawn.

As explained above, Beavin reference does not teach or suggest a query element table that includes arguments to be used in composing a data base command to process data, the data base command comprising a data base query command to be executed by a data base search engine as recited in independent claim 35. Claim 36 depends from claim 35, and thus also distinguishes over the Beavin reference. Therefore, Applicants respectfully submit that the rejection of claims 35 and 26 under 35 U.S.C. § 102(b) should be withdrawn.

Rejection under 35 U.S.C. § 103(a) as being Unpatentable over Beavin in view of Suganuma

The Examiner rejected claims 1-34 under 35 U.S.C. § 103(a) as being unpatentable over Beavin et al. in view of Suganuma (U.S. Patent No. 6,704,748). This rejection is respectfully traversed.

Applicants are filing a Declaration under 37 C.F.R. § 1.131 (see Attachment) to establish that the invention claimed in the present application was reduced to writing in the United States prior to May 31, 2000. Thus, the invention claimed in the present application was invented prior to May 31, 2000. The Suganuma reference cited by the Examiner has a 35 U.S.C. § 102(e) date of August 30, 2000, which is after the date the invention claimed in the present application was invented. Therefore, Suganuma cannot properly be cited against the present application as a prior art reference in a rejection under 35 U.S.C. § 103(a). Further, Applicants submit that, by itself, the Beavin reference fails to render the invention recited in claims 1-34 obvious under 35 U.S.C. § 103(a).

Therefore, it is respectfully submitted that the rejection of claims 1-34 under 35 U.S.C. § 103(a) should be withdrawn.

In order to advance prosecution, Applicants offer the following remarks with regard to the Examiners' application of the Beavin reference to claims 1-34.

Applicants respectfully submit that the Beavin reference is not relevant to the claims 1-34 when each of those claims is properly construed.

First, Applicants fail to understand how the disclosure of Beavin, which only includes: forming one or more new tables out of the operation results, linking data with a single statement and concatenating all or part of two or more tables to create a new resulting table can possibly teach "reading at least one of at least one data base query language command and at least one data base query command argument as a first plurality of elements of a first data base search engine query from a first set of one or more query element database tables" as is recited in the claims. Manipulating user data in a database tables to generate other tables containing that user data is not at all analogous to reading database query language commands and data base query command arguments from a first set of one or more query element database tables, and then, as is claimed for example by independent claim 1 and similarly by the other independent claims:

> assembling a query string from the first plurality of elements, the query string comprising a data base query command to be executed by a data base search engine; and
> executing the first query string to retrieve results from one or more source data tables.

The independent claims of the present invention are drawn to storing the data base query commands and command arguments themselves in database tables, extracting those commands and command arguments themselves from those database tables, assembling a query string from those commands and subsequently executing that query string upon source data base tables to extract resulting data of interest.

The Beavin reference addresses determining data base "access paths" used by an SQL data base management system based upon statistical data that is stored by the data base management system. Beavin, column 1, lines 8-10, column 3, lines 26-30, column 10, lines 46-64. An "access

path" is defined as: "In SQL, the path used to locate <u>data specified in SQL statements</u>. An access path can be indexed, sequential, or a combination of both." *IBM Dictionary of Computing*, Tenth Edition, August, 1993 (Emphasis Added). The "SQL statement" is what is being stored and read by the claimed invention. This is in contrast to the "access path" which is the path used to <u>locate the data</u> in the SQL statement.

Furthermore, the first limitation of amended claim 1 states:

<u>reading</u>, from a first set of database tables <u>by executing a first database query command string</u>, a first plurality of elements, the first plurality of elements comprising at least one database query language command and at least one database query command argument.

The Examiner's rejection dissects this limitation into two parts and considers each of these parts in isolation from each other. Such piecemeal analysis fails to give full consideration to the limitation, let alone consider the claim "as a whole" as required by the statute. For example, the Examiner first dissects out the phrase:

reading a first plurality of elements of a first query from a first set of one or more query element tables.

The Examiner states that this portion of the first limitation is taught by a portion of the Beavin reference that is described by the Examiner as disclosing:

generation of the query plan and selection of an access path involves processor consideration of both the available access paths 'indexes, sequential reads, and system-held statistics on the data to be accessed 'the size of the table, the number of distinct values in a particular column to chose what RDBMS processor considers to be the most efficient access path for the query, the selection of the most efficient access path utilizes query, database and system information that is conventionally available to SQL optimizers.

Paper 12, page 6, last paragraph.

However, the amended claim limitation relates to reading a plurality of elements that comprise at least one database query language command and at least one database query command argument from a set of database tables. The cited portion of Beavin describes the internal processing

of the database engine in the processing of a database query. This recited claim limitation relates to a process, reading elements of a database search engine query, that necessarily has to happen <u>before</u> the database engine processes that query. The cited portion of Beavin relates to events that happen after a query is submitted to the database engine, which <u>implies that the query has already been constructed</u>.

Database engines receive database queries, such as queries that conform to the Structured Query Language (SQL), that specify data to be extracted from one or more database tables, which are computer storage structures usually stored within one or more files on a storage system accessed by a computer. Modern database engines accept the database queries and then perform processing to enhance the efficiency of extracting from the database tables the data specified in the query. Database tables can be large and computing resource requirements can be reduced by developing an "access plan" to access the data specified in the query. The cited portions of Beavin relate to the processing to develop such an access plan and enumerates factors taken into consideration by that processing. Reading elements of a query from one or more tables, as is recited by this claim limitation, is in no way taught or suggested by the cited portions of the Beavin reference.

Although the cited portion of Beavin implies that some data will be read from tables, there is no teaching or suggestion in Beavin that the data read from the database tables is "a first plurality of elements of a first query" as is recited in the claims. In fact, another portion of the Beavin reference teaches that data read from tables is user data, such as employee data. See Beavin at column 1, lines 35-39. The fact that "a first plurality of elements of a first query" is being read by the processing recited for this limitation is especially significant given subsequent limitations in this claim and claims that depend therefrom. As noted above, a proper rejection requires consideration be given to the claimed invention "as a whole." The Examiner cannot simply ignore recited elements or portions of a limitation. Applicants are simply at a loss to see how such unrelated processing that lacks many elements of the claimed limitation can be cited as a teaching of this claim limitation.

The Examiner then considered the next portion of the prior first limitation, which the Examiner paraphrases as:

The first plurality of elements and the one more query element tables comprising at least one of a query language command and a command argument.

The Examiner stated that this portion of the first limitation is taught by a portion of the Beavin reference by stating:

> "As the SQL processor considers the available access paths to the data and considers system statistics on the data to be accessed to select what it considers to be the most efficient access path to evaluate the query and retrieve the results, in which considering the available access paths, the processor checks table indexes and sequential read operations needed. (See cols. 1-2, lines 61-2). Further, in column 1, lines 25-29, Beavin discloses SQL provides table operations with which users can request database information and form one or more new tables out of the operation results, data from multiple tables or views, in which can be linked to perform complex sets of table operation with a single statement.

Paper 12, page 6-7.

However, this second portion of the first limitation cannot be read alone because it modifies the first fragment that was discussed above. Combining these two fragments yields a first limitation for these claims that describes at least one of a query language command and a command argument being read from a first set of database tables. Beavin does not teach or suggest reading at least one of query language command and a query language argument from a database table, as is recited in the complete first limitation.

In contrast to the actual claim limitation, the portion of the Beavin reference cited by the Examiner merely continues to describe the processing by the database engine to determine "the most efficient access path to evaluate the query and retrieve the results" and further describes the SQL operations that create one or more new tables and combine data selectively extracted from tables and place that combined data into a new table. Applicants fail to see how this is at all related to a claim limitation that recites:

> reading, from a first set of database tables by executing a first database query command string, a first plurality of elements, the first plurality of elements comprising at least one database query language command and at least one database query command argument.

The cited portions of the Beavin reference do not teach or suggest the elements recited in the claims. Applicants further respectfully assert that the Examiner is required to cite to a specific portion of the cited reference that teaches the claimed limitation. Applicants fail to see how the cited portions of the Beavin reference relate to this limitation. Applicants have further reviewed the Beavin reference and fail to see any teaching or suggestion of this limitation.

With regard to dependent claims 2 and 17, the Examiner stated that "wherein the step of reading a first plurality of elements includes the sub-steps of reading a name of a second query element table from a first query element table" is taught by Beavin as "the system statistics considered in choosing from available access paths include statistics on the size of tables, the number of distinct values in columns of tables." Paper 12, page 8. Reading a name of a table (i.e., the second query element table in this case) is unrelated to choosing an access path, and considering "statistics on the size of tables, the number of distinct values in columns of tables" is also not related to the recited claim limitation.

This amended claim limitation further specifies a sub-step to the step of "reading a first plurality of elements" as recited in the corresponding independent claim from which each of these dependent claims depend. The "first plurality of elements" is defined in the independent claim as "comprising at least one of at least one database query language command and at least one database command argument." This clearly distinguishes this claim limitation over the Beavin reference.

The Examiner then asserts that "reading a plurality of arguments for the query string from the second table query element" is taught by a cited portion of Beavin characterized as "sequential read operations needed, and the like to determine how it will retrieve data, the system statistics considered in choosing from available access paths include statistics on the size of tables, the number of distinct values in columns of tables." Paper 12, page 8. However, the claim limitation recites "reading a plurality of arguments to be assembled into the query string." The query string of this claim limitation is specified by a preceding claim limitation as "the query string comprising a second database query command string to be executed by a database search engine." This is separate and distinct from the reading of user data as is conventionally performed by database engines and as is

taught by the Beavin reference. The Beavin reference does not teach or suggest reading "arguments for a query string" from a database table.

With regard to claims 3 and 18, the Examiner states that "the step of assembling the query string includes the sub-step of assembling a query string that includes a first query language command and the plurality of arguments." Paper 12, page 8. The cited portion of the Beavin reference describes the SQL "JOIN" operation and states "the 'JOIN' operation, which concatenates all or part of two or more tables to create a new resulting table." Beavin, col 1, lines 33-35, (emphasis added). However, "concatenating all or part of two or more tables" is separate and distinct from "assembling the query string that includes a first query language command and the plurality of arguments." Beavin, in fact, describes an example following this cited portion describes "producing a table that contains the names of all supervisor employees who live in a given city." Beavin, col 1, lines 35-37. This "JOIN" operation is invoked with a query string, and is not used to assemble, or create, the query string, as is recited by this claim limitation.

With regard to claims 4, 19 and 22, the Examiner asserts that "reading a first plurality of elements of a first query from the first set of one or more query element tables further includes the sub-step of reading one or more names corresponding to one or more source data tables from the first query element table." Paper 12, page 8. The Examiner cites the portion of Beavin that is discussed in detail above. The cited portion of Beavin only discusses processing by a data base search engine to determine access paths. (Beavin, Col 2, lines 1-6). The processing of Beavin is not related to:

> reading, from the first set of database tables, one or more names of database tables within the second set of database tables from which the results set is to be retrieved by executing the query string

With regard to claims 5 and 20, these amended dependent claims, which depend ultimately from claims 1 and 19, respectively, specify that:

> sub-step of reading a first plurality of arguments includes the sub-step of reading a plurality of names of columns within database tables in the second set of database tables, the plurality of names of columns to be incorporated into the query string to specify data to retrieve for the results set.

The Examiner states this the similar pre-amended limitation is taught by a portion of Beavin that states:

> As noted above, generation of the query plan and selection of an access path involves processor consideration of both the available access paths (indexes, sequential reads, etc.) and system-held statistics on the data to be accessed (the size of the table, the number of distinct values in a particular column, etc.), to choose what the RDBMS processor considers to be the most efficient access path for the query. The selection of the most efficient access path utilizes query, database, and system information that is conventionally available to SQL optimizers. The selected query plan can be displayed to the user [interactive commands].

Beavin, Col 10, lines 53-64. Again, such a teaching by Beavin of considerations by the processing used to generate a query plan is not relevant to the recited limitations of these amended dependent claims, especially when considered as a whole.

> With regard to claims 6 and 21, these amended claims recite that:
>
> the step of assembling the query string includes the sub-step of concatenating together the first plurality of elements that include the plurality of names of columns

The Examiner cited a portion of the Beavin reference that describes the SQL "JOIN" operation and states "the 'JOIN' operation, which concatenates all or part of two or more tables to create a new resulting table." Beavin, col 1, lines 33-35, (emphasis added). As stated above,"concatenating all or part of two or more tables" as taught by Beavin is separate and distinct from "assembling the query string[]" as is recited in the claims. Beavin, in fact, describes an example following this cited portion that describes "producing a table that contains the names of all supervisor employees who live in a given city." Beavin, col 1, lines 35-37. This "JOIN" operation is invoked with a query string, and is not used to assemble, or create, the query string, as is recited by this claim limitation. Retrieving and manipulating user data from a database is the conventional use of a database and is not a sufficient teaching to render the present invention obvious, which includes assembling a database query command string from elements that themselves were extracted from database tables.

With regard to claim 7, the cited portion of the Beavin reference is irrelevant to the recited limitation of dependent claim 7, which states "reading a _further_ database query language command from the first query element database table."

With regard to the Examiner's rejection of claim 8, amended claim 8 (and also amended claim 23) recites "further comprising the step of reading a plurality of names of columns of a target data database table from the second query element database table, _wherein the target data database table is to receive the results set and the plurality of names of columns are to be included into a database command string_," The Examiner states that this limitation is taught by the portion of Beavin that discusses processing by a data base search engine to determine access paths. (Beavin, Col 2, lines 1-6). Such processing is not related to the limitations of this claim , especially when they are considered as a whole.

With regard to dependent claims 9, 10, 24, 25 and 32, the Examiner again asserts that the limitations of these dependent claims are taught by a portion of the Beavin reference that teaches "concatenating all or part of two or more tables." However, as explained above, the teaching of Beavin is separate and distinct from the recited limitations of these amended claims.

With regard to amended claims 14 and 29, these amended claims specify that "said second plurality of elements contain _database query language elements used in database query command strings that_ specify the _location_ in which data elements are to be stored _in the target data database table_." The Examiner cited a portion of the Beavin reference that discusses techniques used to specify access paths to, for example, to the location of the database table _in the file system_. This is not related to the location of data within the _database table itself_, as is recited for these amended claims. Applicants assert that these claims clearly distinguish over the cited portions of the Beavin reference, and the other cited prior art, particularly when considering these claims "as a whole."

In view of the foregoing, it is respectfully submitted that the application and the claims are in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is invited to call the undersigned attorney at (561) 989-9811 should the Examiner believe a telephone interview would advance the prosecution of the application.

Respectfully submitted,

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120-A00-006